



**CERTIFICATE OF COMPLIANCE**

No. 23-802

WILLIAM BEMBURY,

*Petitioner,*

v.

COMMONWEALTH OF KENTUCKY,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the National Association for Public Defense as *Amicus Curiae* Supporting Petitioner contains 4,377 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

State of Ohio  
County of Hamilton

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 23, 2024.

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Sworn to and subscribed before me by said Affiant on the date designated below.

Date: February 23, 2024  
John D. Gallagher  
Notary Public

[seal]



**JOHN D. GALLAGHER**  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2028